

IN THE
WESTERN DISTRICT COURT
FOR THE
UNITED STATES OF VIRGINIA
LYNCHBURG DIVISION
APRIL, 2009, SESSION

CLERK'S OFFICE U.S. DIST COURT
AT ROANOKE, VA
FILED
APR 23 2009
JOHN F. CORCORAN, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA)

v.)

KAREN PRISCILLA JONES)

Criminal No. 6'09-cr-00015

INDICTMENT

In Violation of:

Title 18, U.S.C. §2

Title 18, U.S.C. §510

Title 18, U.S.C. §1028

Title 18, U.S.C. §1028A

Title 18, U.S.C. §1341

Title 18, U.S.C. §1343

A. INTRODUCTION

At all times material to this Indictment:

1. From on or about April, 2007, until November, 2008, the defendant, **KAREN PRISCILLA JONES**, participated in an identity theft scheme in which personal identifiers of residents at nursing home facilities were used to obtain credit accounts, services, and merchandise without the victims' authorization.

2. The defendant, **KAREN PRISCILLA JONES**, was an employee at The Oaks Assisted Living Facility located in Lynchburg, Virginia.

3. Prior to that time, the defendant, **KAREN PRISCILLA JONES**, was an employee of Avante Assisted Living Facility in Lynchburg, Virginia.

4. As an employee at the Oaks and Avante, the defendant, **KAREN PRISCILLA JONES**

JONES, had access to personal identifiers of its residents.

5. The defendant, **KAREN PRISCILLA JONES**, obtained the following personal identifiers of residents without authorization such as name, date of birth, and social security number.

6. The defendant, **KAREN PRISCILLA JONES**, obtained personal items of the residents without authorization to include driver's licenses, credit cards, and mail.

7. The defendant, **KAREN PRISCILLA JONES**, used personal identifiers of residents and personal items to open financial accounts of residents without permission.

8. The defendant possessed the following items belonging to the victims and opened the following accounts without the permission of the victims:

Victim Identity Used	Account/Item	Account Number	With Consent of the Victim	Loss Amount	Address/ Phone Number Associated w/ defendant
Victim #6	Virginia Driver's License	XXX-XX-X178	No (found in defendant's residence)	X	X
Victim #6	Credit One Bank credit card	XXX-XXX-XXX-XXX-1786	No	\$1711.43	Yes
Victim #1	US Treasury Check	XXX-XXX-XXX-694	No	\$300	X
Victim #2	Capital One	XXX-XXX-XXX-XXX-8759	No	\$450.65	Yes
Victim #2	Discover Card	Discover determined fraudulent application and didn't establish	No	X	Name used by defendant was "James Jones"

Victim #2	Verizon Wireless	(XXX)-XXX-6778 (XXX)-XXX-2476 (phone numbers)	No	\$531.34	Yes
Victim #2	Verizon	XXX-XXX-4834 (phone number)	No	\$476.00	Yes
Victim #2	Appalachian Power (AEP)	XXX-XXXX-8693	No	\$0	Yes
Victim #2	Wal-mart	Previously established card of victim, EH, in defendant's possession	No	X	X
Victim #3	Credit One	XXX-XXX-XXX-XX-6105	No	\$568.55	Yes
Victim #3	Dell	XXX-XXX-XXX-XXX-XXX-4804	No	Account disposed of by Dell	Yes
Victim #3	Goody's	XXX-XXX-XX-9160	No	\$1,313.47	Yes
Victim #3	First Premier Bank	XXX-XXX-XXX-XXX-0572	No	\$410.37	Yes
Victim #4	Capital One	XXX-XXX-XXX-XXX-6198	No	\$0	Yes
Victim #4	Imagine	XXX-XXX-XXX-XXX-2403	No	\$0	Yes
Victim #5	Imagine	XXX-XXX-XXX-XXX-4603	No	\$0	Yes
Victim #5	Orchard Bank/HSBC	XXX-XXX-XXX-XXX-3929	No	\$0	Yes
Victim #5	Dell Financial	XXX-XXX-XXX-XXX-XXX-5396	No	\$1,882.40	Yes

Victim #7	City of Lynchburg (Water)	XXX-XXX-XX-0861	No	\$0	Yes
Victim #7	AT & T Mobile	XXX-XXX-XX-8773 (Account number) (XXX)-XXX-1018 (phone number) (XXX)-XXX-1138 (phone number)	No	\$800.00	Yes
Victim #7	First Citizens Bank	Checks found at defendant's residence	No	\$467.21 (debits from account)	
Victim #8	Verizon	XXX-XXX-XX-5795 (account number) (XXX)-XXX-1517 (phone number)	No	\$342.20	Yes
Victim #9	Comcast Cable	XXX-XXX-XXX-4907	No	X	Yes

VICTIM #1

9. Victim #1 was a resident at The Oaks facility.
10. On or about August 5, 2008, a United States Treasury check issued to Victim #1 was cashed at the J Mart on Memorial Avenue, Lynchburg, Virginia.
11. The owner of the United States Treasury check, Victim #1, never received the check.
12. The owner of the United States Treasury check, Victim #1, never authorized the defendant, **KAREN PRISCILLA JONES**, to cash the check.

13. The endorsement on the check was a forged signature in the name of victim #1.
14. The defendant, **KAREN PRISCILLA JONES**, forged victim #1's check with a social security number, and a Virginia driver's license number of another individual.
15. A thumb print on the front of the check has been identified as the defendant's, **KAREN PRISCILLA JONES**.

VICTIM #2

16. Victim #2 was a resident of the Avante Assisted Living Facility where the defendant, **KAREN PRISCILLA JONES**, previously worked.
17. On April 29, 2008, the defendant, **KAREN PRISCILLA JONES**, applied for a Capital One account number XXX-XXX-XXX-XXX-8759 in the name of victim #2.
18. The defendant, **KAREN PRISCILLA JONES**, used victim #2's name, date of birth, and social security number to open the account.
19. All of the purchases made for the account were fraudulent and each transaction involved interstate commerce communication to Georgia.
20. Between May 11, 2008, through May 22, 2008, the defendant, **KAREN PRISCILLA JONES**, made a total of thirty-nine (39) purchases totaling \$883.24 with the Capital One credit card.
21. On November 5, 2008, during a search warrant of the residence of the defendant, **KAREN PRISCILLA JONES**, the following items were discovered that were opened without victim #2's, permission:

Victim	Type of Account	Phone Number Associated with account/or Account #	Address associated w/account	Address associated with
Victim #2	Verizon Wireless	XXX-XXX-6778 XXX-XXX-2476	726 Grady Street, Lynchburg, Va.	Address associated w/defendant
Victim #2	Verizon land line account	XXX-XXX4834	726 Grady Street, Lynchburg, Va.	Address associated w/defendant
Victim #2	Appalachian Power (AEP)	XXX-XXXX-8693	726 Grady Street, Lynchburg, Va.	Address associated w/ defendant

22. During the search warrant of the residence of defendant, **KAREN PRISCILLA JONES**, a Wal-mart credit card that was previously established by victim #2, was found.

VICTIM #3

23. On or about December , 2007, the defendant, **KAREN PRISCILLA JONES**, opened a Credit One Bank credit card number XXX-XXX-XXX-XX-6105 in the name of victim #3.

24. The address on the account was a address associated with the defendant, **KAREN PRISCILLA JONES**.

25. The phone number associated with the Credit One account was XXX-XXX-3578 which is associated with the defendant, **KAREN PRISCILLA JONES**.

26. The Credit One account was applied for over the internet. The servers for the communication are located in Eden, MN.

27. On November 12, 2007, the defendant, **KAREN PRISCILLA JONES**, opened a Dell financial account XXX-XXX-XXX-XXX-XXX-4804 in victim #3's name.

28. The Dell account was opened using victim #3's name, date of birth, and social security
JONES

number.

29. The address on the Dell account was an address associated with the defendant, **KAREN PRISCILLA JONES**.

30. On November 19, 2007, the defendant, **KAREN PRISCILLA JONES**, opened a Goody's credit card account number XXX-XXX-XX-9160. The Goody's credit card account was opened using victim #3's name, date of birth, and social security number.

31. The Goody's credit card account was established by the defendant, **KAREN PRISCILLA JONES**, without the authorization of victim #3.

32. The defendant, **KAREN PRISCILLA JONES**, opened the Goody's account in person in Lynchburg, Virginia. The account was closed on August 7, 2008, with a loss of \$1,313.47.

33. The defendant, **KAREN PRISCILLA JONES**, opened a First Premier Bank credit card number XXX-XXX-XXX-XXX-0572 in the name of victim #3.

34. The address listed on the account was an address associated with the defendant, **KAREN PRISCILLA JONES**.

VICTIM #4

35. On November 5, 2008, during the search of the defendant, **KAREN PRISCILLA JONES**, residence several accounts were discovered in the name of victim #4.

36. A Capital One credit card number XXX-XXX-XXX-XXX-6198 in the name of victim #4 was found.

37. The account was opened by the defendant, **KAREN PRISCILLA JONES**, in August, 2007, via the internet thru Capital One's server in Georgia.

38. The address on the account was associated with the defendant, **KAREN PRISCILLA JONES**

JONES.

39. The defendant, **KAREN PRISCILLA JONES**, opened an IMAGINE credit card account XXX-XXX-XXX-XXX-2403 using victim #4's identifiers over the internet in August, 2007.

40. Imagine's servers are located in Atlanta, Georgia.

41. The email address associated with the account was "kpjones1@aol.com" which is the email address of the defendant, **KAREN PRISCILLA JONES**.

42. The phone number associated with the account of XXX-XXX-6075 is associated with a relative of the defendant, **KAREN PRISCILLA JONES**.

43. Victim #4 was a resident at Avante nursing home while the defendant, **KAREN PRISCILLA JONES**, was there.

VICTIM #5

44. On November 5, 2009, during the search of the defendant, **KAREN PRISCILLA JONES**, residence three accounts were discovered that were opened in the name of victim #5.

45. An Imagine credit card number was XXX-XXX-XXX-XXX-4603 was discovered during a search of the defendant, **KAREN PRISCILLA JONES**, residence. It was opened over the internet using the email address kpjones1@aol.com. The servers are located in Atlanta, Georgia.

46. The address associated with the account was an address associated with the defendant, **KAREN PRISCILLA JONES**.

47. The name on the account was victim #5's, and her date of birth and social security number were used to open the account.

48. The second account was issued by Orchard Bank/HSBC (XXX-XXX-XXX-XXX-3929) in the name of victim #5.

49. A letter and credit card were found at the defendant, **KAREN PRISCILLA JONES**, residence. The address on the account was associated with the defendant.

50. The phone number associated with the account was XXX-XXX-6075. The phone number was associated with a relative of the defendant, **KAREN PRISCILLA JONES**.

51. The account was opened over the internet using the email address k-jones@hotmail.com.

52. The third account in the name of victim #5 found at the defendant, **KAREN PRISCILLA JONES**, residence was a Dell Financial account #5396 opened in July, 2007.

53. The address on the account was a residence associated with the defendant, **KAREN PRISCILLA JONES**.

54. An account statement for the Dell account was found in the defendant, **KAREN PRISCILLA JONES**, residence detailing a balance of \$1,882.40.

55. Victim #5 was a resident at Avante while the defendant, **KAREN PRISCILLA JONES**, was employed there.

VICTIM #6

56. On November 5, 2008, a genuine Virginia driver's license belonging to victim #6 was located in the residence of defendant, **KAREN PRISCILLA JONES**.

57. The defendant, **KAREN PRISCILLA JONES**, did not have the authority of Victim #6 to possess the license.

58. In the residence of the defendant, **KAREN PRISCILLA JONES**, a letter from Credit One Bank was found. The letter confirmed delivery of a credit card ending in number -1786 in the name of victim #6 delivered to the defendant's previous address.

59. The Credit One application was submitted by the defendant, **KAREN PRISCILLA JONES**, by mail in victim #6's name.

60. The defendant, **KAREN PRISCILLA JONES**, signed the application in the name of victim #6.

61. The defendant, **KAREN PRISCILLA JONES**, used the social security number and date of birth of victim #6 to open the account.

62. The account was active from May, 2007 through June, 2007.

63. There was a loss amount of \$1,711.43 on the account.

64. The phone numbers associated with the account are as follows:

Phone Number associated with Credit Card	Belongs To	Victims Phone Number
XXX-XXX-3578	Karen Smith (defendant's maiden name)	NO
XXX-XXX-6075	Karen Jones relative	NO

VICTIM #7

65. Victim #7 attempted to obtain water services with the City of Lynchburg and was informed an account #0861 in Victim #7's name already existed at a Lynchburg, Virginia, address associated with the defendant, **KAREN PRISCILLA JONES**.

66. The defendant, **KAREN PRISCILLA JONES**, used victim #7's identifiers to establish the account.

67. During the search of the defendant, **KAREN PRISCILLA JONES**, residence additional accounts in victim #7's name were found.

68. An AT&T mobile account # 8773 was found. The phone numbers associated with the accounts were XXX-XXX-1018 and XXX-XXX-1138. The outstanding balance on the account was \$800.00.

69. Victim #7 had a total of \$467.21 in debits from her checking account by the defendant, **KAREN PRISCILLA JONES**, without authorization.

VICTIM #8

70. Victim #8 was a resident at the Oaks facility where the defendant, **KAREN PRISCILLA JONES** worked.

71. The defendant, **KAREN PRISCILLA JONES**, opened a Verizon phone account #5795 in the name of Victim #8.

72. The phone number of XXX-XXX-1517 associated and residence associated with the account are both associated with the defendant, **KAREN PRISCILLA JONES**.

VICTIM #9

73. The defendant, **KAREN PRISCILLA JONES**, opened a Comcast cable account #4907 using Victim #9's information.

74. The Comcast cable account was opened for a location which was a former address associated with the defendant, **KAREN PRISCILLA JONES**.

75. Victim #9 was a resident of Avante when the defendant, **KAREN PRISCILLA JONES**, was an employee.

COUNT ONE THROUGH EIGHT
(AGGRAVATED IDENTITY THEFT)

The Grand Jury charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about April, 2007, and continuing through on or about November, 2008, in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person namely the name, date of birth, and social security numbers assigned to the victims identified herein as "Victim #6", "Victim #2", "Victim #3", "Victim #4" and "Victim #5" during and in relation to Title 18, United States Code, Section 1028A(c)(5), to wit, wire fraud as detailed below:

COUNT	ACCOUNT NUMBER	BANK	IDENTITY THEFT VICTIM
1	*1786	Credit One	Victim #6
2	*8759	Capital One	Victim #2
3	*6105	Credit One	Victim #2
4	*0572	First Premier Bank	Victim #3
5	*6198	Capital One	Victim #4
6	*2403	Imagine	Victim #4
7	*4603	Imagine	Victim #5
8	*3929	Orchard Bank(HSBC)	Victim #5

3. All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5), and 2.

COUNT NINE THROUGH THIRTEEN
(AGGRAVATED IDENTITY THEFT)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about April, 2007, and continuing through on or about November, 2008, in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person namely the name, date of birth, and social security numbers assigned to the victims identified herein as "Victim #2", "Victim #7" and "Victim #8" during and in relation to an offense enumerated under Title 18, United States Code, Section 1028A(c)(4) as detailed below:

COUNT	PHONE NUMBER ENDING *	PHONE (LAND & CELLULAR)	VICTIM
9	XXX-XXX-6778	Verizon Wireless	Victim #2
10	XXX-XXX-2476	Verizon Wireless	Victim #2
11	XXX-XXX-4834	Verizon Land	Victim #2
12	XXX-XXX-8773	AT & T Mobile Account	Victim #7
13	XXX-XXX-5795	Verizon	Victim #8

3. All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(4), and 2.

COUNT FOURTEEN THROUGH SIXTEEN
(AGGRAVATED IDENTITY THEFT)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about April, 2007, and continuing through on or about November, 2008,

in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person namely the name, date of birth, and social security numbers assigned to the victims identified herein as “Victim #2”, “Victim #7” and “Victim #9” during and in relation to an offense enumerated under Title 18, United States Code, Section 1028A(c)(4) as detailed below:

COUNT	ACCOUNT NUMBER	UTILITIES:CABLE, WATER, PHONE	VICTIM
14	*8693	Appalachian Power (AEP)	Victim #2
15	*0861	City of Lynchburg (Water)	Victim #7
16	*4907	Comcast Cable	Victim #9

3. All in violation of Title 18, United States Code, Section 1028A and 2.

COUNT SEVENTEEN
(AGGRAVATED IDENTITY THEFT)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about November 19, 2007, and continuing through on or about August 7, 2008, in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person namely the name, date of birth, and social security numbers assigned to the victim identified herein as “Victim #3” during and in relation to an offense under Title 18, United States Code, Section 1029(a)(2), namely, fraud in connection with access devices, and during an offense enumerated under Title 18, United States Code, Section 1028A(c)(4) as detailed below:

COUNT	ACCOUNT NUMBER	DEPARTMENT STORE	VICTIM NAME
17	*9160	Goody's	Victim #3

3. All in violation of Title 18, United States Code, Section 1028A and 2.

COUNT EIGHTEEN
(AGGRAVATED IDENTITY THEFT)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about November, 2007, in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person namely the name, date of birth, and social security numbers assigned to the victim identified herein as "Victim #3" during and in relation to Title 18, United States Code, Section 1028A(c)(5), to wit, mail fraud, as detailed below:

COUNT	ACCOUNT NUMBER	CREDITOR	VICTIM NAME
18	*4804	DELL Financial	Victim #3

3. All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5), and 2.

COUNT NINETEEN
(POSSESSION OF FRAUDULENT IDENTIFICATION DOCUMENT)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. On or about November 5, 2008, in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, knowingly possessed an identification document other than one

issued lawfully for the use of the defendant, that is, a Virginia driver's license number XXX-XX-6178 issued to Victim #6, with the intent that such document be used to defraud the United States.

3. All in violation of Title 18, United States Code Sections 1028(a)(4) and 2.

COUNT TWENTY
(POSSESSION OF FRAUDULENT IDENTIFICATION DOCUMENT)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. On or about November 5, 2008, in the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, knowingly possessed an identification document other than one issued lawfully for the use of the defendant, that is, a Wal-mart credit card issued to victim #2 with the intent that such document be used to defraud the United States.

3. All in violation of Title 18, United States Code, Sections 1028(a)(4) and 2.

COUNT TWENTY-ONE
(FORGING ENDORSEMENTS ON TREASURY CHECKS)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. On or about September 5, 2008, within the Western District of Virginia, the defendant, **KAREN PRISCILLA JONES**, with the intent to defraud, did pass, utter and publish as true a Treasury check of the United States bearing the falsely made and forged endorsement "Victim #1" thereon, the said check with the falsely made and forged endorsement on the back being Number 42836694 Over Symbol Number 2309 and dated August 1, 2008.

3. All in violation of Title 18, United States Code, Sections 510(a)(2) and 2.

COUNT TWENTY-TWO THROUGH TWENTY-SEVEN
(MAIL FRAUD)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about April, 2007, until November, 2008, the defendant, **KAREN PRISCILLA JONES**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and to obtain money by false and fraudulent pretenses, representations, and promises, did knowingly cause to be sent and delivered, and moved by the United States Postal Service the following:

COUNT	DATE	DESCRIPTION
22	04/27/2007	Defendant returned an application for Credit One credit card via United States Postal Service in the name of victim #6.
23	04/29/2008	Defendant caused a First Premier Bank account credit card #0572 to be mailed to her home residence in the name of victim #3.
24	08/14/2007	Defendant caused a Imagine bank credit card account #4603 to be mailed to her home residence in the name of victim #5.
25	08/23/2007	Defendant caused the mailing of a Orchard Bank/HSBC credit card #3929 to be mailed to her home residence in the name of victim #5.
26	07/26/2007	Defendant caused the mailing of items purchased on a Dell financial account to be mailed to her home residence in the name of victim #5 shipped by DHL ground service.
27	10/01/2007	Defendant caused the mailing of items purchased on a Dell financial account to be mailed to her home residence in the name of victim #5 shipped by DHL express next day service.

3. All in violation of Title 18, United States Code, Section 1341 and 2.

COUNT TWENTY-EIGHT THROUGH THIRTY-THREE
(WIRE FRAUD)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about April 2007, until November, 2008, the defendant, **KAREN PRISCILLA JONES**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud, and to obtain money by false or fraudulent pretenses, representations, and promises, did knowingly cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, an electronic wire from various credit card companies and merchants to their servers outside of Virginia from access devices obtained by the defendant using identifiers of various victims without their permission, and attempting to do so, knowingly and willfully transmitted and caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, pictures and sounds, including those more fully described below:

COUNT	DATE	VICTIM	ACCOUNT	DESCRIPTION	LOCATION RECEIVING WIRE TRANSMISSION
28	05/21/2008	Victim #2	Capital One *8759	Purchase on credit card with Midnight Velvet	Georgia
29	05/21/2008	Victim #2	Capital One *8759	Purchase on credit card with Seventhave.com	Georgia
30	12/17/2007	Victim #3	Credit One *6105	Account opened over the internet	Minnesota

31	08/16/2007	Victim #4	Imagine *2403	Account opened over the internet	Georgia
32	08/02/2007	Victim #5	Imagine *4603	Account opened over the internet	Georgia
33	08/22/2007	Victim #5	Orchard Bank/HSBC *3929	Account opened over the internet	Georgia

3. All in violation of Title 18, United States Code, Sections 1343 and 2.

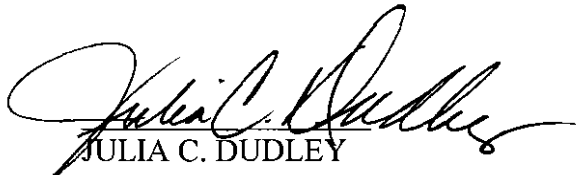
COUNT THIRTY FOUR
(FRAUD IN CONNECTION WITH ACCESS DEVICES)

The Grand Jury further charges that:

1. The Introduction to the Indictment is realleged and made a part of this Count.
2. From on or about November 19, 2007, until August 7, 2008, in the Western District of Virginia the defendant, **KAREN PRISCILLA JONES**, knowingly and with intent to defraud produced, used or trafficked in and used one or more unauthorized access device, to wit, a Goody credit card account XXXX-XXXX-9160, and by such conduct obtained \$1,313.47 worth of money, goods, services, and anything of value, said production, trafficking or use affecting interstate and foreign commerce.

3. All in violation of Title 18, United States Code, Section 1029(a)(2) and 2.

A TRUE BILL this 23 day of April, 2009.


JULIA C. DUDLEY
U. S. ATTORNEY


FOREPERSON